

00:00:00.000 --> 00:00:01.620

Dunn, Debra (DOL)

So we are recording this.

00:00:03.030 --> 00:00:06.180

Dunn, Debra (DOL)

We are required to.

00:00:08.480 --> 00:00:12.370

Dunn, Debra (DOL)

Uh record everybody all the participants so.

00:00:13.380 --> 00:00:15.870

Dunn, Debra (DOL)

If you would pretty please instead of saying your name.

00:00:17.500 --> 00:00:18.940

Dunn, Debra (DOL)

That kind of thing if you could tape.

00:00:20.100 --> 00:00:24.940

Dunn, Debra (DOL)

Type your first and last name into the chat so that we could just record this.

00:00:25.850 --> 00:00:26.550

Dunn, Debra (DOL)

Uhm.

00:00:31.080 --> 00:00:32.830

Dunn, Debra (DOL)

We're still looks like we're.

00:00:34.820 --> 00:00:36.850

Dunn, Debra (DOL)

Still, accepting folks into the.

00:00:38.590 --> 00:00:42.710

Dunn, Debra (DOL)

Into the meeting, so we'll just wait a few minutes here.

00:00:44.130 --> 00:00:47.190

Dunn, Debra (DOL)

They want to give everybody the opportunity to get logged in.

00:00:50.800 --> 00:00:51.370

Dunn, Debra (DOL)

Uhm.

00:00:52.870 --> 00:00:57.530

Dunn, Debra (DOL)

Good morning for those of you who are just joining this, this meeting is being recorded.

00:00:58.720 --> 00:01:06.010

Dunn, Debra (DOL)

So we are required to document all participants so if you could pretty please.

00:01:07.020 --> 00:01:13.770

Dunn, Debra (DOL)

Type your first and last name into the chat instead of we won't do introductions because.

00:01:14.600 --> 00:01:15.240

Dunn, Debra (DOL)

Uhm.

00:01:16.720 --> 00:01:18.450

Dunn, Debra (DOL)

We just have way too many people.

00:01:19.680 --> 00:01:21.720

Dunn, Debra (DOL)

And I am going to type my name.

00:01:31.750 --> 00:01:32.610

Dunn, Debra (DOL)

Running really slow.

00:01:33.700 --> 00:01:35.230

Dunn, Debra (DOL)

For me, maybe because?

00:01:35.890 --> 00:01:37.710

Dunn, Debra (DOL)

We've got so many people.

00:01:39.200 --> 00:01:40.750

Dunn, Debra (DOL)

Still, being admitted.

00:01:50.970 --> 00:01:52.190

Agnes Namutebi

131.

00:01:52.830 --> 00:01:53.520

Agnes Namutebi

Delete line.

00:02:05.860 --> 00:02:06.880

Dunn, Debra (DOL)

We went for.

00:02:07.830 --> 00:02:10.920

Dunn, Debra (DOL)

Teams in really appreciate that we appreciate it.

00:02:12.100 --> 00:02:17.950

Agnes Namutebi

I am hearing feedback from somebody so if you guys could be sure to mute.

00:02:18.100 --> 00:02:21.030

Dunn, Debra (DOL)

Mikes I would appreciate that thank you.

00:02:33.350 --> 00:02:34.120

Dunn, Debra (DOL)

OK.

00:02:35.200 --> 00:02:38.330

Dunn, Debra (DOL)

So I am going to go ahead and get started.

00:02:42.740 --> 00:02:50.610

Dunn, Debra (DOL)

Hello welcome to our webinar today. My name is Debbie Den and I am the data sharing program manager.

00:02:51.580 --> 00:02:56.310

Dunn, Debra (DOL)

As I stated this is being recorded.

00:02:57.280 --> 00:03:01.100

Dunn, Debra (DOL)

So, please be aware of that.

00:03:01.150 --> 00:03:04.900

Dunn, Debra (DOL)

But we are going to be able to share this recording.

00:03:05.720 --> 00:03:09.900

Dunn, Debra (DOL)

Come later in case anybody needs to get a copy of it.

00:03:10.670 --> 00:03:15.680

Dunn, Debra (DOL)

Some if Eric if you could help me manage the admits thank you.

00:03:17.240 --> 00:03:22.950

Dunn, Debra (DOL)

We are asking everyone to type their name into the chat.

00:03:23.850 --> 00:03:27.490

Dunn, Debra (DOL)

Uhm we are required to record participants names.

00:03:28.590 --> 00:03:32.360

Dunn, Debra (DOL)

And looks like we might have.

00:03:35.210 --> 00:03:37.640

Dunn, Debra (DOL)

A few people on the telephone.

00:03:37.690 --> 00:03:38.300

Dunn, Debra (DOL)

Unknown.

00:03:41.010 --> 00:03:44.230

Dunn, Debra (DOL)

As well, who won't be able to type their name in the chat.

00:03:52.530 --> 00:03:56.450

Dunn, Debra (DOL)

We will have those names those numbers recorded as part of the recording so.

00:03:59.150 --> 00:04:00.430

Dunn, Debra (DOL)

Alright so.

00:04:00.480 --> 00:04:02.090

Dunn, Debra (DOL)

Ho hum.

00:04:03.450 --> 00:04:06.480

Dunn, Debra (DOL)

The worst is still coming in OK so.

00:04:06.980 --> 00:04:07.650

Dunn, Debra (DOL)

Uhm.

00:04:09.500 --> 00:04:13.730

Dunn, Debra (DOL)

So I've never done that women are not so I'm looking at 3:00 different screens and I apologize.

00:04:14.630 --> 00:04:17.090

Dunn, Debra (DOL)

For if I'm not looking you straight in the eye.

00:04:17.140 --> 00:04:19.980

Dunn, Debra (DOL)

Right uh but first of all.

00:04:21.400 --> 00:04:39.900

Dunn, Debra (DOL)

Welcome I am amazed by the turn out this is far more than I expected. And we will have another webinar tomorrow. I believe it's at 8:00 o'clock in the morning and those that information is out to you.

00:04:40.560 --> 00:04:44.490

Dunn, Debra (DOL)

Uh hum, but before we go through all of that.

00:04:46.720 --> 00:04:57.530

Dunn, Debra (DOL)

Let's go ahead and just do a couple of introductions of for those of you who just joined and W Den and I'm the data sharing program manager here at DL.

00:04:58.550 --> 00:05:00.750

Dunn, Debra (DOL)

Eric can you please introduce yourself?

00:05:02.380 --> 00:05:03.370

Dunn, Debra (DOL)

Yeah, hi everyone.

00:05:03.580 --> 00:05:06.680

Shields, Eric (DOL)

Shields our compliance manager DLL thank you.

00:05:07.910 --> 00:05:09.420

Shields, Eric (DOL)

And James please.

00:05:10.640 --> 00:05:12.190

Dunn, Debra (DOL)

Hi good morning, I'm James.

00:05:12.250 --> 00:05:15.510

Messer, James (DOL)

Sir I'm the contracts manager in the data management office.

00:05:16.480 --> 00:05:18.410

Messer, James (DOL)

Thank you James for those of you who.

00:05:18.380 --> 00:05:39.760

Dunn, Debra (DOL)

Food haven't realized yet Matt Lewin, who is our previously previous contract manager has still here. Within DL, but he's started a new data. Stewardship program and he's getting up that up and running so James is our contract manager and certainly last but not least.

00:05:39.820 --> 00:05:43.360

Dunn, Debra (DOL)

Just come is Alex are you?

00:05:44.710 --> 00:05:47.180

Dunn, Debra (DOL)

Odd here today somewhere yes, I am.

00:05:48.290 --> 00:05:58.900

Beaulac, Alex (DOL)

Experiencing some bandwidth issues, so I mean, it goes there. My video, but I'm Alex Bell. Like I'm the admin assistant for Fred weighed the director of Open.

00:06:00.480 --> 00:06:02.040

Beaulac, Alex (DOL)

Thanks Alex Alex is.

00:06:01.960 --> 00:06:08.120

Dunn, Debra (DOL)

Gonna play a key role for us today and he's going to record comments and questions for us.

00:06:08.740 --> 00:06:26.790

Dunn, Debra (DOL)

Uh because what we're going to be doing is out of both this session. Tomorrow's webinar and any questions or comments that are submitted to our group mailboxes we will be developing a FAQ.

00:06:28.150 --> 00:06:29.150

Dunn, Debra (DOL)

And.

00:06:30.890 --> 00:06:35.140

Dunn, Debra (DOL)

I just lost my screen.

00:06:37.470 --> 00:06:40.890

Dunn, Debra (DOL)

What are you guys seeing it looks like I'm seeing if your email?

00:06:42.430 --> 00:06:44.630

Dunn, Debra (DOL)

OK, that's not my email.

00:06:47.360 --> 00:06:52.100

Dunn, Debra (DOL)

Did someone take control someone took control so we're looking at somebody 's email?

00:06:53.880 --> 00:06:55.240

Dunn, Debra (DOL)

Please relinquish control.

00:07:03.990 --> 00:07:06.000

Dunn, Debra (DOL)

OK let's try this again.

00:07:07.050 --> 00:07:08.920

Dunn, Debra (DOL)

I'm going to try to.

00:07:09.750 --> 00:07:12.070

Dunn, Debra (DOL)

Uh present at the end.

00:07:18.930 --> 00:07:20.320

Shields, Eric (DOL)

Anyway as

00:07:20.280 --> 00:07:21.480

Dunn, Debra (DOL)

This is coming up.

00:07:22.990 --> 00:07:25.200

Dunn, Debra (DOL)

Are you? Are you able to see my screen again?

00:07:26.270 --> 00:07:26.740

Dunn, Debra (DOL)

Yes.

00:07:27.380 --> 00:07:27.790

Dunn, Debra (DOL)

OK.

00:07:32.120 --> 00:07:37.610

Dunn, Debra (DOL)

So anyway, what I was saying, is we're going to do a FAQ of sorts.

00:07:38.560 --> 00:08:00.580

Dunn, Debra (DOL)

And be distributing that out, probably as updates, Cisco go as well. I was really hoping to have a kind of a website that we could just post this on stuff on and and things could get people could self serve themselves on the epic use and attachments and things like that. We just weren't able to do that, so as.

00:08:00.640 --> 00:08:10.880

Dunn, Debra (DOL)

Uh RFA Q Gets updated we will be sending that out to the contract administrator or managers and for each service is the administrators.

00:08:11.850 --> 00:08:15.830

Dunn, Debra (DOL)

Come on a regular basis, so that you guys will have all that information.

00:08:18.220 --> 00:08:19.200

Dunn, Debra (DOL)

Uhm.

00:08:20.330 --> 00:08:24.490

Dunn, Debra (DOL)

I'm sorry, it looks like I've lost. I I jumped ahead on the pages unfortunately.

00:08:25.100 --> 00:08:28.890

Dunn, Debra (DOL)

When I somehow lost control of the screen.

00:08:28.940 --> 00:08:29.300

Dunn, Debra (DOL)

What?

00:08:30.510 --> 00:08:31.260

Dunn, Debra (DOL)

OK.

00:08:33.070 --> 00:08:34.550

Dunn, Debra (DOL)

So dumb.

00:08:35.740 --> 00:08:59.890

Dunn, Debra (DOL)

So first of all we're just for the agenda. We're gonna have an introduction to wax which is the acronym for administrative Washington administrative code, which are administrative rules, then we will have a just a brief overview of the new contract template.

00:09:00.580 --> 00:09:07.430

Dunn, Debra (DOL)

Uh and Eric will go over the changes to the compliance in there.

00:09:08.260 --> 00:09:16.330

Dunn, Debra (DOL)

Uh in that template we do wanna save the bulk of the time for the Q&A. So our presentations will be at a fairly high level.

00:09:17.200 --> 00:09:27.500

Dunn, Debra (DOL)

Because we do want to hear your questions comments. That sort of thing and then James is going to do just a kind of a closing comments and summarize.

00:09:28.090 --> 00:09:28.860

Dunn, Debra (DOL)

For us.

00:09:30.770 --> 00:09:40.750

Dunn, Debra (DOL)

So last year substitute Senate bill 5152 passed in the Legislature. It is a a build that.

00:09:41.390 --> 00:09:43.890

Dunn, Debra (DOL)

Uh twist specific to DLL.

00:09:44.810 --> 00:09:50.400

Dunn, Debra (DOL)

And it created a few new statutes, which are there on the screen?

00:09:51.220 --> 00:09:54.870

Dunn, Debra (DOL)

Uhm and it also updated.

00:09:55.660 --> 00:10:04.120

Dunn, Debra (DOL)

Some of the permissible uses both for abstract of driving records as well as vehicle owner information.

00:10:05.910 --> 00:10:07.350

Dunn, Debra (DOL)

And so.

00:10:07.760 --> 00:10:08.220

Dunn, Debra (DOL)

Uhm.

00:10:09.390 --> 00:10:37.940

Dunn, Debra (DOL)

You need to be aware of those, and go look at that statute. If you haven't already the bill, although off also authorizes DLL to make additional requirements, so in that statute under 4622010. It does say some specific things that DL is supposed to do contractually and then gives us the authority to make additional contract requirements.

00:10:38.410 --> 00:10:44.530

Dunn, Debra (DOL)

And that's what this whack process and the contract template are all about.

00:10:45.600 --> 00:11:02.630

Dunn, Debra (DOL)

For the most part well OK. I'll go into that for a second in a minute here. I don't want to jump ahead of myself. The law actually went into effect in July. But with the rulemaking that we're doing, and getting stakeholder input.

00:11:03.250 --> 00:11:08.460

Dunn, Debra (DOL)

On our contract template we are anticipating that the the.

00:11:09.250 --> 00:11:17.190

Dunn, Debra (DOL)

Draft or the wax and the contract templates will be effective November first of this year.

00:11:18.400 --> 00:11:25.270

Dunn, Debra (DOL)

This is the first time we've done rulemaking for this and.

00:11:25.670 --> 00:11:29.610

Dunn, Debra (DOL)

Uhm also for a broader.

00:11:30.440 --> 00:11:41.890

Dunn, Debra (DOL)

Uh stakeholder input on our draft contract terms and conditions. So we're really excited about this because we really want your input.

00:11:42.620 --> 00:11:43.390

Dunn, Debra (DOL)

Uhm.

00:11:44.940 --> 00:11:56.040

Dunn, Debra (DOL)

Uh we are trying to balance we have a you know a responsibility to do so. The residents of Washington to protect their personal information.

00:11:57.020 --> 00:11:59.660

Dunn, Debra (DOL)

But yeah, it's we also wanted to balance.

00:12:00.420 --> 00:12:07.810

Dunn, Debra (DOL)

Uh our requirements with business needs as well, or concerns that are business partners have.

00:12:08.420 --> 00:12:09.910

Dunn, Debra (DOL)

And so uh.

00:12:11.090 --> 00:12:30.300

Dunn, Debra (DOL)

So that's what we're trying to do with this brand new process. We're very happy to be doing this, I've been wanting to do it for several years now and this is the first opportunity. We've actually had to do it, so and this will be the first opportunity where everybody will be on the same contract terms and conditions as well so as you're reviewing.

00:12:30.980 --> 00:12:38.180

Dunn, Debra (DOL)

Uh the draft, Wack and the contract terms and conditions.

00:12:38.690 --> 00:12:39.520

Dunn, Debra (DOL)

Uhm.

00:12:40.370 --> 00:13:09.720

Dunn, Debra (DOL)

We're asking you that, if something seems overly burdensome before rejecting it. You know off summarily just rejecting it. We're asking that you look at the rationale for that closet. It could be that maybe we didn't word it right or we could have worded it better. That kind of thing, so with that documents that we send out with the whack and the contract template there's a table.

00:13:10.560 --> 00:13:19.510

Dunn, Debra (DOL)

In the opening pieces of those that I believe it's the right hand column that kind of talks about what our intent is here.

00:13:20.980 --> 00:13:26.070

Dunn, Debra (DOL)

And so when providing comment back to us we ask that.

00:13:27.120 --> 00:13:34.940

Dunn, Debra (DOL)

That you cite the specific clause or section that you're referring to that will help us understand.

00:13:35.410 --> 00:13:40.240

Dunn, Debra (DOL)

Uhm exactly where you're focusing on help us to understand.

00:13:40.870 --> 00:13:48.380

Dunn, Debra (DOL)

Uh your position and why you have a concern for it or why you're suggesting the change.

00:13:49.110 --> 00:13:49.960

Dunn, Debra (DOL)

Uh hum.

00:13:51.310 --> 00:13:55.890

Dunn, Debra (DOL)

That kind of thing, so that we can kind of understand and see from your perspective.

00:13:57.410 --> 00:14:08.390

Dunn, Debra (DOL)

That's what's going on and we may also then want to call you and maybe have a conversation to understand it that further again.

00:14:08.790 --> 00:14:09.470

Dunn, Debra (DOL)

Uhm.

00:14:10.290 --> 00:14:12.970

Dunn, Debra (DOL)

Uh we will be developing a?

00:14:13.740 --> 00:14:17.150

Dunn, Debra (DOL)

FAQ and distributing that.

00:14:18.020 --> 00:14:19.220

Dunn, Debra (DOL)

Throughout.

00:14:20.110 --> 00:14:23.390

Dunn, Debra (DOL)

The UM course of this.

00:14:24.960 --> 00:14:25.760

Dunn, Debra (DOL)

Process.

00:14:29.430 --> 00:14:32.400

Dunn, Debra (DOL)

Oh, Washington administrative code.

00:14:33.250 --> 00:14:37.440

Dunn, Debra (DOL)

I don't know your guys is familiarity, but we have.

00:14:38.450 --> 00:14:53.000

Dunn, Debra (DOL)

Statute that is enacted by the Legislature. Then the agencies have authority to do what we call rulemaking or make administrative rules and those have basically the same force and effect.

00:14:53.690 --> 00:15:01.990

Dunn, Debra (DOL)

Of the statute and so our purpose here in rulemaking is to codify.

00:15:02.650 --> 00:15:08.270

Dunn, Debra (DOL)

And kind of fill in the gaps to implement the law and at a high level.

00:15:08.980 --> 00:15:20.330

Dunn, Debra (DOL)

The processes and procedures that deal will follow in sharing protected personal information. Now that's a new term, which I will go over with here in on the next slide.

00:15:20.380 --> 00:15:20.650

Dunn, Debra (DOL)

Made.

00:15:21.980 --> 00:15:25.230

Dunn, Debra (DOL)

And for the our purposes here.

00:15:26.980 --> 00:15:28.830

Dunn, Debra (DOL)

It'll be very high level.

00:15:29.440 --> 00:15:40.990

Dunn, Debra (DOL)

Uh and again, I will refer you back to that chart that table that we provided with the whack for the intent of each section? What we're trying to do there.

00:15:41.040 --> 00:15:45.190

Dunn, Debra (DOL)

Right but there is a couple of things that I would like to go over.

00:15:46.940 --> 00:16:17.180

Dunn, Debra (DOL)

I I I need to apologize my cat is meowing in the background in a so if you hear her. I I apologize. She likes to participate so anyway, so there are few things in the definition section. We have, I believe there's 21 definitions. The term personal protected information because we have defined personal information in.

00:16:17.230 --> 00:16:20.690

Dunn, Debra (DOL)

In Wack as well as identity information in Wack.

00:16:21.420 --> 00:16:28.010

Dunn, Debra (DOL)

Uh but we just combined those 2 terms into protected personal information so it means both.

00:16:30.180 --> 00:16:30.510

Dunn, Debra (DOL)

We.

00:16:30.370 --> 00:16:32.500

Lisa Jones

Have also a new term customer.

00:16:32.430 --> 00:16:32.750

Dunn, Debra (DOL)

Sure.

00:16:34.250 --> 00:16:38.970

Dunn, Debra (DOL)

Customer is someone who?

00:16:39.020 --> 00:16:52.750

Dunn, Debra (DOL)

Who uh an agent or a recipient may be requesting the data on behalf of but doesn't actually provide the data to them. They just process the data on their behalf.

00:16:53.370 --> 00:17:02.780

Dunn, Debra (DOL)

There will be a requirement in the contract that when submitting for example, your sub recipient list. It's now being expanded.

00:17:03.850 --> 00:17:17.580

Dunn, Debra (DOL)

To include customers as well, we feel that our Washington residents have a right to know who is getting their data and using their data, so that's what that is for?

00:17:19.040 --> 00:17:24.860

Dunn, Debra (DOL)

Uh and then there are some terms that are almost interchangeable.

00:17:25.910 --> 00:17:33.600

Dunn, Debra (DOL)

And so I wanted to kind of display it here in this table. The term recipient is not new.

00:17:34.370 --> 00:17:39.760

Dunn, Debra (DOL)

Uh uh recipient is anyone who gets to read data directly from DL.

00:17:40.890 --> 00:17:42.700

Dunn, Debra (DOL)

They could also be an agent.

00:17:43.920 --> 00:17:51.730

Dunn, Debra (DOL)

Acting on behalf of somebody else to pull the record or they could be just the request are themselves.

00:17:53.020 --> 00:17:58.410

Dunn, Debra (DOL)

And the the request here is the person that has actual the actual permissible use.

00:18:00.140 --> 00:18:01.180

Dunn, Debra (DOL)

So.

00:18:02.780 --> 00:18:12.800

Dunn, Debra (DOL)

In the example of our East services. We have some businesses that can just pull in ADR down download for themselves that would be a requester.

00:18:13.450 --> 00:18:14.920

Dunn, Debra (DOL)

And also a recipient.

00:18:16.080 --> 00:18:20.240

Dunn, Debra (DOL)

The sub recipients sorry I need to tuck in my cat here.

00:18:22.550 --> 00:18:23.590

Dunn, Debra (DOL)

Sorry about that.

00:18:25.310 --> 00:18:25.920

Dunn, Debra (DOL)

Uhm.

00:18:27.010 --> 00:18:42.500

Dunn, Debra (DOL)

The sub recipient is someone who receives the the personal information or the protected personal information from a recipient or an agent. They also can be an agent and they can also be the request are.

00:18:43.190 --> 00:18:49.060

Dunn, Debra (DOL)

So our new legislation allows for multiple agents so for example.

00:18:49.600 --> 00:18:57.850

Dunn, Debra (DOL)

Uh and which didn't happen before, but for example, bobs pizza has hired an employment agency too.

00:18:57.900 --> 00:19:07.810

Dunn, Debra (DOL)

You UM hired some drivers and manage their driving records for example, that employment agency uses a data broker.

00:19:08.680 --> 00:19:15.160

Dunn, Debra (DOL)

The Who posted the data directly from us so the data broker is the recipient.

00:19:16.000 --> 00:19:26.660

Dunn, Debra (DOL)

This sub recipient, maybe the agent or or and or the requester if Bob 's pizzas. Will it also ends up with the data or bumps pizza could be the customer if they don't actually get the driving record.

00:19:30.780 --> 00:19:36.490

Dunn, Debra (DOL)

And so there are agent can just be the recipient and they could also be a sub recipient.

00:19:37.540 --> 00:19:43.310

Dunn, Debra (DOL)

And then Requester Is everybody could be everybody and depending on all the scenarios.

00:19:44.030 --> 00:19:49.280

Dunn, Debra (DOL)

So I know it's confusing but I hope that will help as you read through these terminologies.

00:19:49.810 --> 00:19:54.440

Dunn, Debra (DOL)

Uh and through our terms and conditions that might help understand.

00:19:55.040 --> 00:19:57.720

Dunn, Debra (DOL)

Uh where we were going there.

00:20:02.510 --> 00:20:17.500

Dunn, Debra (DOL)

And you will also notice that we put the definitions and whack that is for consistency. We want all all of the terms or the definitions to be consistent across all data contracts.

00:20:19.060 --> 00:20:21.140

Dunn, Debra (DOL)

So Speaking of data contracts.

00:20:23.470 --> 00:20:26.020

Dunn, Debra (DOL)

Because we're doing this.

00:20:28.190 --> 00:20:39.060

Dunn, Debra (DOL)

Uh stakeholder input we will not be negotiating contracts. We have done that in some instances, with people in the past.

00:20:39.680 --> 00:20:55.340

Dunn, Debra (DOL)

Uh we are doing this for a couple of reasons, one to get gather everybody stakeholder input upfront. Everybody will have the same terms and conditions as everybody else with a few exceptions, so for example.

00:20:55.790 --> 00:20:56.540

Dunn, Debra (DOL)

Uhm.

00:20:59.330 --> 00:21:08.350

Dunn, Debra (DOL)

Uh there are some terms and conditions requirements that might apply to driving records versus vehicle records and vice versa.

00:21:08.960 --> 00:21:28.390

Dunn, Debra (DOL)

If you are a public entity versus a private entity there might be a few differences there. But generally speaking, everybody will operate under the same terms and conditions. It has a especially in the private sector it will have.

00:21:28.890 --> 00:21:52.620

Dunn, Debra (DOL)

Like uh effective leveling the playing field for everyone as well as make it much more easier on Derek 's team when trying to do all these audits. We have hundreds of contracts to audit at some point at some level and so to have different contracts and different terms and conditions isn't working for us so.

00:21:52.670 --> 00:21:54.440

Dunn, Debra (DOL)

No uh.

00:21:55.180 --> 00:22:02.770

Dunn, Debra (DOL)

So, please provide your input that's what this is for the rewrite of the contract.

00:22:03.590 --> 00:22:04.400

Dunn, Debra (DOL)

Uhm.

00:22:05.850 --> 00:22:25.540

Dunn, Debra (DOL)

It you'll notice some things that have changed so the data licensing statements. We've moved some things that are specific to a particular data service or a particular type of data to the data licensing statement so that the general terms and conditions are consistent across all contracts.

00:22:26.810 --> 00:22:38.200

Dunn, Debra (DOL)

Some of those requirements like for those who are required to do audits for driving records to make sure that that release of interest was signed.

00:22:39.240 --> 00:22:44.570

Dunn, Debra (DOL)

That would uh you know that would be moved into the data licensing statement for driving records.

00:22:49.010 --> 00:22:52.930

Dunn, Debra (DOL)

For the most part, though what we've done is.

00:22:53.820 --> 00:22:54.660

Dunn, Debra (DOL)

Uhm.

00:22:55.640 --> 00:23:09.860

Dunn, Debra (DOL)

Tried to not just to kind of memorialize our current practices. We are not changing a lot of the requirements themselves, although there are some and we will try to go over those for you.

00:23:10.980 --> 00:23:36.360

Dunn, Debra (DOL)

We have done a lot of rewrite as we've gone through audits. We have learned that sometimes we didn't write a clause as clearly as we had intended to or it could have been interpreted a couple of different ways. That kind of thing. So we're trying to do that rewrite so that it's clear about what our requirements are in that everybody can understand better.

00:23:37.560 --> 00:23:44.810

Dunn, Debra (DOL)

There are a couple contract requirements changes that I would like to try to go over and Eric will go over some as well.

00:23:45.870 --> 00:23:50.410

Dunn, Debra (DOL)

We are now looking at requiring cyber liability insurance.

00:23:51.960 --> 00:24:20.990

Dunn, Debra (DOL)

It is a new requirement and the clause that you have in the contract right now. The template is the old version. We are still working on trying to figure out how to do this and once we have a new clause drafted we will share that as well for stakeholder input. Our intent is to do it on a sliding scale so if you get a handful of records per year.

00:24:22.050 --> 00:24:27.510

Dunn, Debra (DOL)

And you would likely not be required to.

00:24:27.560 --> 00:24:32.550

Dunn, Debra (DOL)

Do uh have the cyber liability insurance and then as.

00:24:33.160 --> 00:24:38.360

Dunn, Debra (DOL)

This yeah, the more records, you get the higher the requirement will be.

00:24:40.460 --> 00:24:52.350

Dunn, Debra (DOL)

And we are looking at that it would be the number of records. You have on a person so for example, on driving records, you May.

00:24:52.830 --> 00:25:09.590

Dunn, Debra (DOL)

Uh pull a record on a monthly basis throughout the year to ensure that you've got the most current information on them, but you're only doing it on one person so that would count as one record over the course of a year. It would not count as 12 for the purposes of cyber liability insurance.

00:25:11.180 --> 00:25:11.690

Dunn, Debra (DOL)

And.

00:25:13.100 --> 00:25:17.310

Dunn, Debra (DOL)

There are some things that we're also considering where.

00:25:18.660 --> 00:25:24.690

Dunn, Debra (DOL)

We might be able to mitigate that up and we're we're considering.

00:25:25.300 --> 00:25:34.100

Dunn, Debra (DOL)

Uhm some factors where maybe if you recently had a data security with audit with us.

00:25:34.710 --> 00:25:44.020

Dunn, Debra (DOL)

And whether there was deficiencies or not if he had deficiencies there were all corrected no deficiencies at all if you have.

00:25:44.690 --> 00:25:53.180

Dunn, Debra (DOL)

Other things we're still trying to figure out what that is, but then we might be able to require a lower level of the cyber liability insurance.

00:25:53.850 --> 00:26:04.160

Dunn, Debra (DOL)

Uhm so still still looking at that and when we have something more solidified that we can share with you and get your input on we will certainly do that.

00:26:09.080 --> 00:26:17.940

Dunn, Debra (DOL)

Uhm one of the new requirements as well is and some of you already do this, but it will be a system requirement.

00:26:18.940 --> 00:26:20.980

Dunn, Debra (DOL)

When you request, the record.

00:26:21.830 --> 00:26:29.450

Dunn, Debra (DOL)

And this is for the bulk data customers not the East service customers at this point but the book data.

00:26:30.120 --> 00:26:30.790

Dunn, Debra (DOL)

Uh.

00:26:31.860 --> 00:26:40.430

Dunn, Debra (DOL)

We we were going to ask you to you'll be required to both submit the the sub recipients name and the permissible use.

00:26:41.320 --> 00:26:43.730

Dunn, Debra (DOL)

Again, that's for transparency reasons.

00:26:44.840 --> 00:26:48.110

Dunn, Debra (DOL)

Or and the customer name customer name if you weren't if the.

00:26:48.790 --> 00:26:56.390

Dunn, Debra (DOL)

Customer is not receiving the protected personal information. We believe that our residents have the right to know where their data is being used.

00:26:57.010 --> 00:27:02.120

Dunn, Debra (DOL)

And sometimes if they see the name of a data broker.

00:27:03.010 --> 00:27:27.630

Dunn, Debra (DOL)

They don't really understand that that data broker who shared the information on with their employer. For example, or their insurance company. They don't recognize the name of the data brokers so that's why we're asking for that requirement and then I mentioned earlier. The sub recipient versus customer. We are going to ask for like example on the sub recipient list. It'll be the sub recipient and customer list.

00:27:33.530 --> 00:27:37.160

Dunn, Debra (DOL)

I think I covered that page and Eric.

00:27:38.250 --> 00:27:40.070

Dunn, Debra (DOL)

Would you like to?

00:27:40.940 --> 00:27:43.420

Dunn, Debra (DOL)

Discuss compliance changes.

00:27:44.430 --> 00:27:45.850

Dunn, Debra (DOL)

Yes, I would thank you Debbie.

00:27:46.870 --> 00:28:00.210

Shields, Eric (DOL)

So, in compliance one of things I want to lay out as a foundation between the RCW 's or or state statutes of the new wack the new rules in our contract.

00:28:00.840 --> 00:28:27.950

Shields, Eric (DOL)

I mean, we have a theme which is basically we're handling data on behalf of our customers are residents in a way that reflects a privacy framework. So you'll see themes about data minimization data retention. The shortest time possible conducting audits and so forth so that results in many of the requirements that you now see in the contract.

00:28:29.080 --> 00:28:35.540

Shields, Eric (DOL)

And at the end of the day that's what my team is responsible to enforce hence our compliance program.

00:28:36.800 --> 00:28:56.960

Shields, Eric (DOL)

Some things I want to point out First off we have a number of preemptions. There's a couple of things that arise over time. Uh one being that we're being asked to sign a non-disclosure agreement to protect the information that we're accessing with conducting an audit or an investigation.

00:28:58.220 --> 00:29:12.450

Shields, Eric (DOL)

Uh by entering into this agreement you basically accept the fact that we have accessed here audits without having to sign in non disclosure agreement. And if the wording in the agreement is not to your satisfaction.

00:29:13.520 --> 00:29:42.370

Shields, Eric (DOL)

And you think you would still need us to sign it, NDA before stepping into your audits, then we need that input because the requirement to sign an NDA causes delay and it's one that we're hoping to avoid the other piece. There is the exemption from disclosure. This is we have a public record act and it exempts from public disclosure data security audits that we've had a number of our entities attempt.

00:29:43.040 --> 00:29:50.550

Shields, Eric (DOL)

Uh to claim that they don't have to disclose their audit us because it's exempt and so we're removing that as well.

00:29:52.420 --> 00:30:05.510

Shields, Eric (DOL)

Uh you're gonna see if there's a piece in here on a privacy requirements and what this is done. So we've encompassed data security permissible use and privacy into one umbrella set of requirements.

00:30:06.730 --> 00:30:14.440

Shields, Eric (DOL)

And again this was back to this idea of a privacy framework where you have security permissible use and so on.

00:30:15.440 --> 00:30:37.360

Shields, Eric (DOL)

Some of the biggest changes you're going to see here well. We want you to have privacy policies. We want you to understand the significance of protecting this information that we're sharing again. Our job is to give our residents confidence that every step of the way that where their data is being accessed. It is secure from harm.

00:30:38.810 --> 00:30:41.790

Shields, Eric (DOL)

Uh next data disposal is one that stands out.

00:30:42.530 --> 00:30:43.190

Shields, Eric (DOL)

Uh.

00:30:43.960 --> 00:30:52.410

Shields, Eric (DOL)

What we're after here is that we want you to keep the data for as short a time as possible once it's been used.

00:30:53.100 --> 00:30:57.200

Shields, Eric (DOL)

For the purpose that you requested it, it needs to be removed.

00:30:58.090 --> 00:31:07.820

Shields, Eric (DOL)

And so we're looking for you to have a pretty tight policy on how long you gonna keep the data for business use and that's what will be auditing against.

00:31:08.640 --> 00:31:16.440

Shields, Eric (DOL)

One of the big pieces here that pertains to the Fair Credit Reporting Act F CRA Fikru.

00:31:17.170 --> 00:31:39.830

Shields, Eric (DOL)

Uh we've often heard that the FCRA is caused to keep data for a long period of time. We are taking that away as a basis to retain data there must be a sound legal basis for you to retain data not on the off chance that you're hoping to protect yourself from a lawsuit.

00:31:43.140 --> 00:32:04.010

Shields, Eric (DOL)

Audits previously we had audits defined under the terms and conditions. Now we've attached attachment. DD Delta to the agreement and so we've tried to lay out a couple of things one regarding you know the objectives of the audits road and you know what each audit will be testing you for.

00:32:05.320 --> 00:32:21.300

Shields, Eric (DOL)

And it raises the information about corrective action plans an important note here is on the annual statement of compliance and this is where we are also then going to enforce their corrective action plan, so whether you are a boat customer service customer.

00:32:22.460 --> 00:32:28.680

Shields, Eric (DOL)

You generally need to provide us with an annual statement of compliance and this is where it will be enforcing those as well.

00:32:29.880 --> 00:32:30.380

Shields, Eric (DOL)

Ah.

00:32:31.460 --> 00:32:33.110

Shields, Eric (DOL)

Other big things that pop out.

00:32:34.710 --> 00:32:38.950

Shields, Eric (DOL)

Uh we will be invoicing now for the review of data security audits.

00:32:39.580 --> 00:32:49.700

Shields, Eric (DOL)

The statutes have always read that the Department is not responsible for the cost of the audit and we've always absorbed our internal costs to review the audit.

00:32:50.290 --> 00:33:20.060

Shields, Eric (DOL)

And with the new wax and with the new contract. We will be invoicing for that now. I want to point out that our invoices are typically in the neighborhood of 4 figures. And while that may sound like a lot. I'm going to point out that many states charged for their audits and we hear stories of them charging 5 to 6 figures for their audits. So we believe that the work. We're doing its due diligence. It's reasonable.

00:33:20.300 --> 00:33:23.390

Shields, Eric (DOL)

And the prices are will be uh as.

00:33:24.460 --> 00:33:33.160

Shields, Eric (DOL)

Best we can do the attachment does layout those areas that will be invoicing for so again. We're looking for your comments and feedback on that.

00:33:35.080 --> 00:33:45.890

Shields, Eric (DOL)

One of the biggest things here when you have sub recipients in one that I'm sure is gonna cause a little bit of heartburn. Historically, we've had this aspect that you're required to pass through the requirements.

00:33:46.940 --> 00:33:49.080

Shields, Eric (DOL)

As they pertain to securing data.

00:33:49.690 --> 00:34:02.950

Shields, Eric (DOL)

Or the PPI is the term we use now are protected personal information or you passed that PPI through to a sub recipient. We want you to pass through the requirements and we've had.

00:34:03.790 --> 00:34:12.260

Shields, Eric (DOL)

A host a whole number of versions of reasons, a White House pay successful or unsuccessful.

00:34:13.010 --> 00:34:24.540

Shields, Eric (DOL)

How we want to make it simple and I know it appears burdensome if you're keen on this topic you know a 6 page. Addendum seems like a heck of a a task.

00:34:25.110 --> 00:34:42.160

Shields, Eric (DOL)

But we wanna make it very clear on what requirements you need to pass through in your agreement with your sub recipients. I expect will have no shortage of feedback on this one, but that's the intent. We want to remove any.

00:34:43.000 --> 00:34:45.960

Shields, Eric (DOL)

Any doubt on what we want you to pass through.

00:34:46.860 --> 00:34:52.040

Shields, Eric (DOL)

2 now, so that's a big one, I look for your comments on that.

00:34:52.840 --> 00:34:53.310

Shields, Eric (DOL)

Uh.

00:34:54.090 --> 00:34:56.300

Shields, Eric (DOL)

I'm gonna one last comment. I'm gonna make real quick.

00:34:57.740 --> 00:35:25.280

Shields, Eric (DOL)

We have couple of comments one we have a new type of audit for those of you with sub recipient side drive records. We used to call it a desk audit or a sub recipient audit, we now. Call it a consent audit or we're looking to see that you obtained the authorized consent from the named individual and we'll be doing that whether it be a bulk agreement and he's service agreement and so on, but that's the consent audit.

00:35:26.220 --> 00:35:33.270

Shields, Eric (DOL)

Uh we're also making it very clear that you when you have some recipients need to audit your sub recipients.

00:35:34.020 --> 00:36:03.980

Shields, Eric (DOL)

And we are not defining the term audit, but when it comes to that. Rather, we want you to do what a reasonable person would interpret that you did some due diligence to make sure that your sub recipients were in compliance with the Washington addendum. So there's no expectation that you're requiring a sock to type 2 audit, but instead it's gotta pass what I call a straight.

00:36:04.030 --> 00:36:17.940

Shields, Eric (DOL)

Face test that you did some due diligence, so happy to answer any questions later and so forth, but that's a rough outline of the compliance pieces and some of the requirements that you'll find in the client track some of that.

00:36:18.740 --> 00:36:19.520

Shields, Eric (DOL)

Back to You Debbie.

00:36:20.930 --> 00:36:22.620

Shields, Eric (DOL)

Thanks, Eric.

00:36:23.720 --> 00:36:24.840

Dunn, Debra (DOL)

We are.

00:36:26.380 --> 00:36:38.470

Dunn, Debra (DOL)

Make sure I got the mouse is moving on to our Q&A section and appropriately. We've got a Q and so Eric there's a question in the chat related to.

00:36:39.570 --> 00:36:43.280

Dunn, Debra (DOL)

The slide that you purchased on would you like me to read that for you?

00:36:44.950 --> 00:36:46.810

Dunn, Debra (DOL)

I see it if that's the.

00:36:46.910 --> 00:36:50.150

Shields, Eric (DOL)

Question from William is that right? Yes.

00:36:52.420 --> 00:36:58.110

Shields, Eric (DOL)

Uh consideration being given to having an itemized invoice well, I just changed.

00:36:59.160 --> 00:37:00.660

Shields, Eric (DOL)

Yeah, so for long question.

00:37:01.070 --> 00:37:03.270

Dunn, Debra (DOL)

Bye bye OK, so for those of you on the phone.

00:37:03.110 --> 00:37:13.530

Shields, Eric (DOL)

Phone this is the question is there any consideration being given to having an itemized invoice option or perhaps an itemized list available upon request.

00:37:14.300 --> 00:37:23.150

Shields, Eric (DOL)

When we've had issues with discrepancies in the past, we have been unable to identify which user was at fault for corrective action.

00:37:24.120 --> 00:37:24.710

Shields, Eric (DOL)

Ah.

00:37:25.650 --> 00:37:28.430

Shields, Eric (DOL)

Let me think about this for a second Mister understand it properly.

00:37:32.520 --> 00:37:34.260

Dunn, Debra (DOL)

See you tomorrow, I do want to point out.

00:37:36.160 --> 00:37:52.210

Dunn, Debra (DOL)

That the answer is that we're going to give here today are just the verbal answers or preliminary until we can do formal review of all our questions and make sure that we understand the question you know that kind of thing, so look for your FA Q coming.

00:37:52.760 --> 00:37:53.430

Dunn, Debra (DOL)

Uhm.

00:37:55.080 --> 00:38:00.660

Dunn, Debra (DOL)

To formally answer the questions but I think both Eric and I have a relatively good grasp.

00:38:01.300 --> 00:38:07.390

Dunn, Debra (DOL)

I'm not our intentions are so hopefully, we'll be able to give you a good, solid answer.

00:38:08.980 --> 00:38:10.170

Dunn, Debra (DOL)

OK, so trivia.

00:38:11.200 --> 00:38:23.550

Shields, Eric (DOL)

A question from William Monroe Yeah, I think that David Itemized Invoice is doable. It's a sound suggestion and one that we will look at so that you know which parts of it.

00:38:23.600 --> 00:38:28.190

Shields, Eric (DOL)

Uhm burn what which parts of the invoice pertained to which activity on our part.

00:38:29.680 --> 00:38:31.210

Shields, Eric (DOL)

So we'll take that under advisement.

00:38:32.060 --> 00:38:39.460

Shields, Eric (DOL)

And then to the comment that you've had issues with discrepancies in the past and being unable to identify which user was at fault.

00:38:40.170 --> 00:38:41.840

Shields, Eric (DOL)

Uh for corrective action.

00:38:42.470 --> 00:38:42.860

Shields, Eric (DOL)

Uh.

00:38:43.920 --> 00:38:49.110

Shields, Eric (DOL)

I need some more color on that one or some additional information to understand that's a question or just in statement.

00:38:51.230 --> 00:38:57.760

Shields, Eric (DOL)

And William if you're there, you we would come off, mute and talking about that one real quick sure Eric thank you.

00:38:58.300 --> 00:39:01.020

Munroe, William

I apologize the there wasn't perhaps very clear.

00:39:02.370 --> 00:39:16.680

Munroe, William

The the topic of audits brought me to our use logs or or look at logs that we maintain we've got 14 employees and at 1:00 point, all of us had access and and utilized the service.

00:39:18.390 --> 00:39:33.820

Munroe, William

We failed an audit couple years back because somebody must not have logged something or something like that, so since then. We have checked we get an invoice. It's for you know \$4.10 or whatever.

00:39:34.240 --> 00:39:36.190

Munroe, William

Alright so wouldn't that \$4.12.

00:39:37.390 --> 00:39:40.640

Munroe, William

And you know, we divide that amount by 4 cents we know how many.

00:39:40.810 --> 00:39:47.600

Munroe, William

Uh how many searches we did, and then I compare that to how many searches are logged.

00:39:48.560 --> 00:39:53.510

Munroe, William

But if there's a discrepancy. I don't have a way to find out who.

00:39:54.170 --> 00:39:55.650

Munroe, William

Did a search that wasn't locked?

00:39:56.820 --> 00:39:58.630

Munroe, William

And that's a problem because obviously.

00:39:59.520 --> 00:40:05.000

Munroe, William

We need to correct that persons using program so is that an an Easter.

00:40:04.880 --> 00:40:06.110

Dunn, Debra (DOL)

Yes yes.

00:40:07.420 --> 00:40:13.610

Dunn, Debra (DOL)

Uh and administrator I believe should have the right to see you what everybody looked at.

00:40:14.890 --> 00:40:22.570

Dunn, Debra (DOL)

And so we there's I believe there's some user guides on that Susan can you Debbie this? Yeah, this is Susan?

00:40:22.610 --> 00:40:37.210

Mitchell, Susan (DOL)

No CPS that is one option, CPS does not provide but the the people on our side that doing the audits. They could provide the information to the administrator. We can run a report here and provide it to the administrator.

00:40:37.780 --> 00:40:38.300

Mitchell, Susan (DOL)

That's correct.

00:40:38.680 --> 00:40:42.080

Mitchell, Susan (DOL)

Think I'll mute myself in just a moment is it.

00:40:41.960 --> 00:40:48.900

Munroe, William

Possible to request that prior to an audit so if I recognize oh in January, we added discrepancy.

00:40:49.480 --> 00:40:52.610

Munroe, William

I'd like to audit ourselves is that possible.

00:40:54.340 --> 00:40:56.900

Munroe, William

Yes, you can just submit.

00:40:56.760 --> 00:41:00.710

Dunn, Debra (DOL)

It's a request to our data services group box.

00:41:01.460 --> 00:41:03.770

Dunn, Debra (DOL)

Wonderful thank you, yeah, yeah.

00:41:05.710 --> 00:41:10.820

Dunn, Debra (DOL)

Now that we like to introduce Susan Mitchell, many of you probably have worked with her on the services side.

00:41:11.400 --> 00:41:19.800

Dunn, Debra (DOL)

Uh she is a lifeline for a lot of our E services folks and so appreciate that you're here today, Susan to help us.

00:41:20.420 --> 00:41:24.550

Dunn, Debra (DOL)

Answer the questions she is much more of a subject matter expert on the.

00:41:25.800 --> 00:41:28.490

Dunn, Debra (DOL)

These services than I am so.

00:41:28.880 --> 00:41:30.470

Dunn, Debra (DOL)

I also want to say I do believe that we

00:41:30.330 --> 00:41:34.920

Mitchell, Susan (DOL)

We have that on our list of to do 's to add that function that the administrators.

00:41:35.430 --> 00:41:46.120

Mitchell, Susan (DOL)

Uh we have that ability because that is on some of our other services. Like I believed apps and Diaz has ability so we do have that our To Do List to add that to CPS great thank you.

00:41:46.680 --> 00:41:56.370

Dunn, Debra (DOL)

so just so you know, we have a long list of things that we would like RIT Department to do to improve our our data services.

00:41:57.940 --> 00:42:02.410

Dunn, Debra (DOL)

And unfortunately right now they are very short handed.

00:42:03.110 --> 00:42:12.420

Dunn, Debra (DOL)

And UM have quite a large backlog of work to do, including some really high priority stuff like implementing legislation.

00:42:13.200 --> 00:42:17.070

Dunn, Debra (DOL)

So we don't anticipate that.

00:42:18.660 --> 00:42:25.020

Dunn, Debra (DOL)

Our stuff is going to get any attention soon but that doesn't mean we're going to let go of the idea.

00:42:26.950 --> 00:42:32.440

Dunn, Debra (DOL)

Will still be pushing to have our stuff done just when our IT staff.

00:42:33.290 --> 00:42:40.190

Dunn, Debra (DOL)

Team is back staffed up and they've caught up on their battle backlog so thank you for your patience on that.

00:42:42.100 --> 00:42:43.920

Dunn, Debra (DOL)

OK next question.

00:42:43.970 --> 00:42:47.100

Dunn, Debra (DOL)

Turned up from James.

00:42:47.770 --> 00:42:57.850

Dunn, Debra (DOL)

Uh if I can paraphrase 'cause it's kind of a long question you guys. It looks like you use contracted plate search and get charged with a 4 cents a record, but you often?

00:42:58.030 --> 00:43:02.390

Dunn, Debra (DOL)

Uhm request very few records and so you get.

00:43:03.070 --> 00:43:04.400

Dunn, Debra (DOL)

You know these tiny bills.

00:43:04.900 --> 00:43:08.260

Dunn, Debra (DOL)

Uh we can certainly work we do have some.

00:43:09.290 --> 00:43:16.090

Dunn, Debra (DOL)

That we build a less frequently than monthly like quarterly or something like that, we could work with Accounting Department on that.

00:43:16.800 --> 00:43:30.230

Dunn, Debra (DOL)

And then also the other question on that was can. We just not charge if there's you know a minimum amount of records will have to look into that. We are required to charge fees in some areas.

00:43:31.210 --> 00:43:39.100

Dunn, Debra (DOL)

And so I would have to look into that to see what our flexibility is there, but it's it might be a good idea.

00:43:43.020 --> 00:43:46.570

Dunn, Debra (DOL)

And Jason did that kind of answer your question.

00:43:49.070 --> 00:43:49.490

Dunn, Debra (DOL)

That's right.

00:43:50.090 --> 00:43:52.350

Shields, Eric (DOL)

Yes, I did thank you OK thanks.

00:43:56.990 --> 00:43:57.990

Dunn, Debra (DOL)

Federal.

00:44:01.720 --> 00:44:07.660

Dunn, Debra (DOL)

Oh, OK what's the curls asking what the difference is between a bulk punts customer and any service.

00:44:08.820 --> 00:44:10.800

Dunn, Debra (DOL)

So yeah, the

00:44:11.590 --> 00:44:23.810

Dunn, Debra (DOL)

uh it's not really about the volume, although the work term bulk kind of implies that it's really how you get your data so come on East service is almost like.

00:44:24.970 --> 00:44:42.400

Dunn, Debra (DOL)

Uh and app. Maybe that you, you log directly in to our service whether it be contracted plate. Search driver record request abandoned vehicle reporting. You log directly into our system and you can request the record or do whatever you're doing.

00:44:43.030 --> 00:44:45.980

Dunn, Debra (DOL)

Uhm directly in our system.

00:44:47.950 --> 00:44:59.920

Dunn, Debra (DOL)

The other the book is either a web interface or SFTP process where we generate the file put it out on the secure.

00:45:01.630 --> 00:45:12.560

Dunn, Debra (DOL)

Site and then the customer picks it up from that, and then uses the data. From there, so that's kind of the 2 differences. I hope Carol did that help you understand.

00:45:16.060 --> 00:45:17.520

Dunn, Debra (DOL)

The thumbs up or

00:45:21.190 --> 00:45:21.680

Carol Landwehr (Guest)

OK.

00:45:24.620 --> 00:45:25.870

Carol Landwehr (Guest)

OK, well, I'm going to move on.

00:45:26.430 --> 00:45:28.460

Dunn, Debra (DOL)

yeah, I'll do it, I'll take the next month.

00:45:28.850 --> 00:45:29.190

Shields, Eric (DOL)

OK.

00:45:29.600 --> 00:45:54.150

Shields, Eric (DOL)

And then so this is from Alex and it talks about the you know the 5 figure range on invoices when conducting audits and and this question. The concern that you know city of Tacoma would they be paying you know thousands of dollars or more for us to perform an audit when they only request a small number of records each year.

00:45:55.110 --> 00:45:56.860

Shields, Eric (DOL)

So I want to point out.

00:45:57.450 --> 00:46:10.600

Shields, Eric (DOL)

Uh when I throw out those figures earlier. That's when we audit. The larger the the bulk data recipients where they are required to undergo idea to security audit permissible use on it.

00:46:11.990 --> 00:46:13.090

Shields, Eric (DOL)

Every few years.

00:46:14.200 --> 00:46:44.470

Shields, Eric (DOL)

The E services that perhaps you're referencing how we have the discretion and you see that in the contract template. We have the discretion to conduct an audit, but it's a risk based approach a day in day out. It's gonna be simple submit your annual statement compliance because there's just no way for us to audit thousands of East service customers on a practical basis, so we would do it.

00:46:44.520 --> 00:46:58.200

Shields, Eric (DOL)

Or risk based if we had caused because of some large risk that we encountered there would be a series of discussions at the end of the conversation. It could lead to an audit, but I would suggest that the.

00:46:58.690 --> 00:47:07.580

Shields, Eric (DOL)

The probability of us auto tenant E service to the tune of \$1000.00 or more is very, very, very low.

00:47:12.090 --> 00:47:13.140

Carol Landwehr (Guest)

Thank you.

00:47:14.390 --> 00:47:21.730

Dunn, Debra (DOL)

The next question is probably for you as well. Can you please clarify why federal law if RCA does not or data?

00:47:22.530 --> 00:47:27.410

Dunn, Debra (DOL)

Retention requirements aren't necessary when other jurisdictions require it.

00:47:28.340 --> 00:47:29.450

Dunn, Debra (DOL)

A great question.

00:47:30.320 --> 00:48:01.410

Shields, Eric (DOL)

And one that we've debated with folks the last several years. I wanna read of the FCRA in conjunction with opinions that we've received from council and they attorney generals office is that we don't find a data retention requirement in federal law. We see, there's a disposal requirement to dispose of the data. But it speaks to the technology used so that the data is rendered unrecoverable, but there's no timeline that we can.

00:48:01.470 --> 00:48:31.800

Shields, Eric (DOL)

Find an on this topic in the absence of us seen definitive statutory guidance from the federal agencies on this topic. We are importing our take on the matter. So if there is citations that we can see if there is a specific that can be brought to our attention will absolutely consider it but were unable to find that at this point, so that's our approach when it comes to.

00:48:31.970 --> 00:48:34.490

Shields, Eric (DOL)

Retention and disposal of the PPI.

00:48:36.000 --> 00:48:36.810

Shields, Eric (DOL)

Yeah, so.

00:48:37.070 --> 00:48:49.010

Dunn, Debra (DOL)

With that, if I may just kind of add as is then that we have to rely on the data has a permissible use once that permissible use has been accomplished.

00:48:50.070 --> 00:49:09.420

Dunn, Debra (DOL)

Uh you know you've got their driving record you being your hiring decision or you know for parking purposes or whatever. You're using the data for then that permissible use has been met and the data is no longer retained now in the case of on the clarified that a little bit so for instance, in parking or tolling.

00:49:09.940 --> 00:49:15.400

Dunn, Debra (DOL)

Uh you know you may not need that data a little longer to actually collect from the person.

00:49:16.010 --> 00:49:25.790

Dunn, Debra (DOL)

That's fine once you've collected or cleared out that you know record or account or something or excuse me account, then that record can be deleted so.

00:49:26.520 --> 00:49:27.710

Dunn, Debra (DOL)

Hey it's

00:49:29.060 --> 00:49:30.290

Dunn, Debra (DOL)

I'm gonna take out of that.

00:49:30.840 --> 00:49:44.870

Shields, Eric (DOL)

Like in yes object to legal record retention requirements, so like in Washington public agencies have record retention requirements. So that would factor into that conversation as well. That's a good point. Thank you.

00:49:46.300 --> 00:49:52.390

Dunn, Debra (DOL)

OK, OK, so next question also for you, or how often will the audits be done so.

00:49:53.140 --> 00:50:12.490

Shields, Eric (DOL)

There's 2 types of audits and then let me break this out there's 2 types of customers that were

recipients. We have our E services and we have our bulk data. Let me speak to the East purposes. First we consider the annual statement compliance where that's a requirement in your contract.

00:50:13.300 --> 00:50:35.490

Shields, Eric (DOL)

A type of audit so we are testing for compliance and looking to get your acknowledgement to that fact going back to the question, we had earlier from city of Tacoma. It's a risk based approach. If we see problems that warranted further investigation that could trigger a more in depth audit, but free services.

00:50:36.160 --> 00:51:06.370

Shields, Eric (DOL)

Think of the annual statement of compliance as the audit on the bulk data side where we are required to conduct the audit 's we have followed the practice from our office of the chief information officer where state agencies are required to do in a triennial Oreo and audit every 3 years now. So we've borrowed that as a best practice. But the bulk data recipients will note that again. Here we're looking at a bit of a risk based approach.

00:51:06.600 --> 00:51:22.390

Shields, Eric (DOL)

Yeah, well, we can identify lower risks and we are going to extend that we will extend that out to 4 years. However, we see high risks. It could be every 2 years. So we're looking for about a median 3 year but figure it's no more.

00:51:24.570 --> 00:51:33.880

Shields, Eric (DOL)

I should say no last night at least once every 4 years before the bulk data recipients have both uh uh permissible use and data security on it.

00:51:36.860 --> 00:51:37.970

Shields, Eric (DOL)

Thank you Eric.

00:51:40.590 --> 00:51:55.840

Dunn, Debra (DOL)

Elizabeth is asking we use these services law enforcement and I'm unable to see what each user polls. So will we be able to get more access to review Elizabeth. May I ask what you service, you are using?

00:52:01.000 --> 00:52:02.220

Carol Landwehr (Guest)

Yes, it's daps.

00:52:02.790 --> 00:52:03.140

Carol Landwehr (Guest)

OK.

00:52:03.530 --> 00:52:05.000

Massa, Elizabeth

Susan can you help me with that.

00:52:05.090 --> 00:52:07.310

Dunn, Debra (DOL)

It just administrators that can see.

00:52:08.070 --> 00:52:09.660

Dunn, Debra (DOL)

Or is IT managers as well.

00:52:10.290 --> 00:52:12.070

Dunn, Debra (DOL)

I believe it's just administrators.

00:52:12.360 --> 00:52:14.190

Mitchell, Susan (DOL)

OK, so that's

00:52:14.280 --> 00:52:15.920

Dunn, Debra (DOL)

'cause that's a

00:52:17.000 --> 00:52:20.790

Dunn, Debra (DOL)

the limitation in the system if you need to see what?

00:52:22.420 --> 00:52:23.010

Dunn, Debra (DOL)

What?

00:52:23.900 --> 00:52:27.030

Dunn, Debra (DOL)

Uh users are pulling ask your administrator to pull that report.

00:52:28.370 --> 00:52:29.060

Dunn, Debra (DOL)

Uhm.

00:52:30.190 --> 00:52:32.900

Dunn, Debra (DOL)

At this point, I don't think we have.

00:52:33.640 --> 00:52:35.770

Dunn, Debra (DOL)

And intend to expand that.

00:52:36.410 --> 00:52:37.270

Dunn, Debra (DOL)

Come to see.

00:52:38.090 --> 00:52:39.000

Dunn, Debra (DOL)

Uh.

00:52:40.030 --> 00:52:45.220

Dunn, Debra (DOL)

But if you see that there might be a need for managers to have that we could look into it again.

00:52:45.750 --> 00:52:51.220

Dunn, Debra (DOL)

Uh it would probably be quite a while from now because of RIT resource issues.

00:52:54.590 --> 00:53:01.380

Dunn, Debra (DOL)

Carmen, please clarify your position of changing or charging for reviewing of the data security audits.

00:53:02.150 --> 00:53:06.120

Dunn, Debra (DOL)

Eric you wanna yeah, so does he continue the question there.

00:53:06.590 --> 00:53:14.830

Shields, Eric (DOL)

Uh is that isolated to reviewing it data security audits or are you intending to charge for the 3 year permissible use audit.

00:53:15.540 --> 00:53:38.490

Shields, Eric (DOL)

Uh so we already charge for the permissible use audit and that's something that we've done since day. One now that's the time that we've spent when conducting the audit, so there's a description of that in the audit table under cost of audit. It lays out the things that we would be invoicing for.

00:53:39.130 --> 00:53:53.420

Shields, Eric (DOL)

And then it would also that apply to the data security audits as found in that first column of detail in the table, so to answer both types of audits that will be invoiced.

00:53:57.210 --> 00:53:58.990

Carol Landwehr (Guest)

And again that is because.

00:53:58.880 --> 00:54:04.890

Dunn, Debra (DOL)

As the statute now requires that we are not responsible for the cost to be on it.

00:54:06.950 --> 00:54:12.070

Dunn, Debra (DOL)

A question from Alex I missed zero and my previous question \$10,000.00 audit.

00:54:12.950 --> 00:54:15.020

Dunn, Debra (DOL)

So that's a worst worse.

00:54:15.050 --> 00:54:17.860

Shields, Eric (DOL)

Case scenario we've seen the.

00:54:19.710 --> 00:54:27.450

Shields, Eric (DOL)

Again, this, who go back to when we were doing the work and well when we've been doing the work the Odyssey bring in the range of 3 to.

00:54:28.540 --> 00:54:34.350

Shields, Eric (DOL)

When we're not traveling it's in the neighborhood of 3 to 4 hours even say \$5000.00.

00:54:34.960 --> 00:54:35.370

Shields, Eric (DOL)

Ah.

00:54:36.320 --> 00:54:39.230

Shields, Eric (DOL)

It's really hot permissible you cited we haven't done.

00:54:39.850 --> 00:54:45.990

Shields, Eric (DOL)

And we haven't invoiced for data security audit yet so we don't know what that's going to look like. But I imagine it's going to be similar.

00:54:48.620 --> 00:54:50.170

Carol Landwehr (Guest)

It really I think part of it.

00:54:51.040 --> 00:54:52.030

Dunn, Debra (DOL)

Also in

00:54:52.940 --> 00:54:55.910

Dunn, Debra (DOL)

for at least data security it would depend on the complexity.

00:54:56.710 --> 00:55:12.140

Dunn, Debra (DOL)

Of the environment? How much you're getting for example, we have some recipients who get multiple

types of data driver vehicle vessel data so they use E services and book data interfaces and so you know the bigger.

00:55:12.870 --> 00:55:13.630

Dunn, Debra (DOL)

The UM.

00:55:14.620 --> 00:55:16.700

Dunn, Debra (DOL)

And the variety of data the bigger the audit.

00:55:20.550 --> 00:55:28.480

Dunn, Debra (DOL)

Can we get an estimate invoice prior to signing at as we have to get approved prior to budgeting and asking for money.

00:55:30.760 --> 00:55:31.020

Dunn, Debra (DOL)

Is?

00:55:30.900 --> 00:55:33.230

Carol Landwehr (Guest)

Not related I assume that's related.

00:55:33.110 --> 00:55:36.100

Dunn, Debra (DOL)

To the audit question, yeah, and we can do that.

00:55:36.580 --> 00:55:39.480

Shields, Eric (DOL)

Uh again, it's gonna be basis, Debbie just pointed out.

00:55:40.650 --> 00:55:43.860

Shields, Eric (DOL)

Size of the system number of records pulled cetera.

00:55:44.930 --> 00:56:02.560

Shields, Eric (DOL)

So we can give a range to give you an idea and that's one of the things that we've been by trying to get this out now is so that those who are developing their budgets. In the coming year. I don't see us invoicing for the data security audits until on next year 2023.

00:56:03.440 --> 00:56:05.040

Shields, Eric (DOL)

When this gets up and operational.

00:56:06.200 --> 00:56:08.810

Shields, Eric (DOL)

So there's time and, yes, we can provide an estimate.

00:56:09.880 --> 00:56:11.550

Shields, Eric (DOL)

And since we now have.

00:56:11.840 --> 00:56:19.610

Dunn, Debra (DOL)

Done some permissible use on its several of them. I think where we would be better at estimating them, then we were.

00:56:20.340 --> 00:56:22.690

Dunn, Debra (DOL)

Prior to ever doing them before so.

00:56:23.900 --> 00:56:24.830

Dunn, Debra (DOL)

Let's see.

00:56:28.250 --> 00:56:29.390

Carol Landwehr (Guest)

Jason you're welcome.

00:56:30.600 --> 00:56:31.380

Dunn, Debra (DOL)

Paula.

00:56:34.070 --> 00:56:35.850

Carol Landwehr (Guest)

I have kept all this.

00:56:35.740 --> 00:56:43.560

Dunn, Debra (DOL)

Driving records, I have run in a locked cabinet so you're stating I need to shred all the records.

00:56:45.330 --> 00:56:47.050

Dunn, Debra (DOL)

This is for employees OK.

00:56:55.650 --> 00:56:55.850

Carol Landwehr (Guest)

Here.

00:56:55.910 --> 00:56:57.150

Carol Landwehr (Guest)

Doing work in Israel.

00:56:57.170 --> 00:56:59.320

Dunn, Debra (DOL)

Could you OK? Could you explain?

00:57:03.820 --> 00:57:05.880

Carol Landwehr (Guest)

OK, so uhm.

00:57:08.110 --> 00:57:09.690

Dunn, Debra (DOL)

For employment purposes.

00:57:11.910 --> 00:57:14.910

Dunn, Debra (DOL)

You're not gonna have to research that one do you know the answer to that one Eric?

00:57:16.260 --> 00:57:17.450

Dunn, Debra (DOL)

I don't, either.

00:57:17.370 --> 00:57:30.280

Shields, Eric (DOL)

And I would defer to what the legal requirements are yeah, if it's your policy to keep the records we would look for a lot to back that up.

00:57:31.910 --> 00:57:41.800

Shields, Eric (DOL)

'cause we are going to insert that our contract made trump a discretionary decision spouse and policy at year end so.

00:57:42.560 --> 00:57:43.010

Shields, Eric (DOL)

Uh.

00:57:44.030 --> 00:57:48.990

Shields, Eric (DOL)

Yeah, it's important, yeah, sorry, yeah, so for example, if you've got driving record.

00:57:48.850 --> 00:57:56.340

Dunn, Debra (DOL)

Periods of commercial drivers license commercial drivers there might be some.

00:57:57.440 --> 00:58:16.610

Dunn, Debra (DOL)

Transportation laws well Israel. I don't know, but like FM CSA or US Department of Transportation might require that you keep those records while the persons employed or something like that, so you would have to defer to whatever this requirement is.

00:58:20.400 --> 00:58:21.710

Carol Landwehr (Guest)

And that doesn't answer it.

00:58:22.520 --> 00:58:23.870

Shields, Eric (DOL)

Paula, please let us know.

00:58:30.010 --> 00:58:32.760

Carol Landwehr (Guest)

OK next question was is so deep.

00:58:32.630 --> 00:58:36.750

Shields, Eric (DOL)

Yes, it's service, it is it is a service.

00:58:36.640 --> 00:58:45.890

Dunn, Debra (DOL)

That is specifically designed for courts to use to interface with us to adjudicate records too.

00:58:45.940 --> 00:58:51.490

Dunn, Debra (DOL)

You dumb submit forms to us that kind of thing we do have a couple of.

00:58:52.090 --> 00:58:52.820

Dunn, Debra (DOL)

Uhm.

00:58:54.930 --> 00:59:03.820

Dunn, Debra (DOL)

Uh other types of users in that system, especially since we've added more functionality than service. But

Yes Diaz is any service.

00:59:08.230 --> 00:59:10.070

Carol Landwehr (Guest)

I'm gonna take the next question this is.

00:59:10.210 --> 00:59:12.240

Shields, Eric (DOL)

John King.

00:59:13.580 --> 00:59:22.950

Shields, Eric (DOL)

Clarify for me, please have a group of 3 to 4 officers using DAP switches are a driver and plate search. I used by law enforcement primarily.

00:59:23.630 --> 00:59:24.200

Shields, Eric (DOL)

Uh.

00:59:25.190 --> 00:59:33.930

Shields, Eric (DOL)

And they request registered owner information on approximately 8 to 10,000 times a year. Does that mean we are subject to thousands of dollars worth of audits.

00:59:34.580 --> 00:59:38.250

Shields, Eric (DOL)

Uh in a worst case scenario yes.

00:59:39.090 --> 00:59:50.770

Shields, Eric (DOL)

Practically speaking, no again in the in the dapps being one of our E services. We are going to lean on the annual statement of compliance.

00:59:52.110 --> 00:59:59.570

Shields, Eric (DOL)

I go back again if the risks are there and we would talk to you and go down that path up doing an audit?

01:00:00.220 --> 01:00:09.250

Shields, Eric (DOL)

In my 5 years being with the program. We have never conducted an audit or had cause to conducting audit button Eservice customer so.

01:00:09.970 --> 01:00:18.000

Shields, Eric (DOL)

This is one of those things that you see in the contract. It gives us the right. But the odds of us exercising that are limited.

01:00:22.060 --> 01:00:23.340

Carol Landwehr (Guest)

Uh a question.

01:00:23.240 --> 01:00:30.300

Dunn, Debra (DOL)

And from Elizabeth related to daps and law enforcement and the retention of the records.

01:00:31.330 --> 01:00:39.170

Dunn, Debra (DOL)

For government entities like law enforcement we rely on you to follow your record retention policies.

01:00:40.370 --> 01:00:41.730

Dunn, Debra (DOL)

For keeping the record.

01:00:43.600 --> 01:00:44.160

Dunn, Debra (DOL)

So.

01:00:44.800 --> 01:00:46.410

Dunn, Debra (DOL)

You know each.

01:00:47.660 --> 01:00:52.440

Dunn, Debra (DOL)

State governmental entity has a requirement to have record retention policies for that.

01:00:53.170 --> 01:00:54.400

Dunn, Debra (DOL)

Please rely on those.

01:00:55.040 --> 01:00:55.390

Dunn, Debra (DOL)

Yep.

01:00:57.840 --> 01:01:00.140

Dunn, Debra (DOL)

And we accept those I'll just say.

01:01:01.440 --> 01:01:03.140

Shields, Eric (DOL)

We accept that? Yes.

01:01:06.280 --> 01:01:06.710

Shields, Eric (DOL)

Do they?

01:01:06.630 --> 01:01:08.860

Carol Landwehr (Guest)

And then this is from Matt did I understand.

01:01:08.900 --> 01:01:19.450

Dunn, Debra (DOL)

From your statement earlier that when personal information is gathered that person that person must be informed of the access of their information.

01:01:20.730 --> 01:01:21.500

Dunn, Debra (DOL)

Uh.

01:01:22.560 --> 01:01:22.950

Dunn, Debra (DOL)

At.

01:01:26.500 --> 01:01:27.830

Carol Landwehr (Guest)

The consent requirement.

01:01:28.150 --> 01:01:30.080

Shields, Eric (DOL)

Yeah, not necessarily there are some.

01:01:29.970 --> 01:01:32.760

Dunn, Debra (DOL)

Uhm instances, so for.

01:01:33.310 --> 01:01:46.320

Dunn, Debra (DOL)

Uh we for an attorney or an investigator requesting vehicle owner information for example, we have to notify them that the record was given to an attorney or an investigator we don't say who.

01:01:47.390 --> 01:01:53.360

Dunn, Debra (DOL)

Uh there are and have been several privacy bills.

01:01:53.930 --> 01:01:57.380

Dunn, Debra (DOL)

Uhm introduced both at the federal and state level.

01:01:58.080 --> 01:02:00.050

Dunn, Debra (DOL)

And so.

01:02:00.750 --> 01:02:08.800

Dunn, Debra (DOL)

Uh we are anticipating that that's going to be a contractor a legal requirement at some point but.

01:02:10.570 --> 01:02:18.660

Dunn, Debra (DOL)

Uh we are kind of getting ahead of that and requiring it now that you let us know.

01:02:20.970 --> 01:02:23.360

Dunn, Debra (DOL)

Who that record is 4?

01:02:24.120 --> 01:02:27.540

Dunn, Debra (DOL)

So that the the owner of that record can.

01:02:29.380 --> 01:02:32.430

Dunn, Debra (DOL)

Uh have transparency about how their data is being used.

01:02:37.420 --> 01:02:39.210

Carol Landwehr (Guest)

We don't uh in the.

01:02:39.090 --> 01:02:41.590

Dunn, Debra (DOL)

OK, well, except for the case of.

01:02:42.170 --> 01:03:01.210

Dunn, Debra (DOL)

Where legal recent consent is required or the attorney investigator scenario that I just mentioned we don't typically proactively email anybody and say, Hey, you know, so and so we pulled your record for insurance underwriting or anything like that. But if they call and ask us. We want to be able to tell them what how their data is being used.

01:03:04.910 --> 01:03:07.100

Dunn, Debra (DOL)

Uh from car end.

01:03:09.240 --> 01:03:36.840

Dunn, Debra (DOL)

I apologize if you already covered this, but I recall seeing in the summary that there is a \$20,000.00 several penalty. How do we see that pedal? How do you see this penalty being applied? Yes, there is we've always had criminal penalties in LA for the misuse of data now under our new legislation. There is up to \$20,000.00 civil penalty per incident.

01:03:37.650 --> 01:03:40.100

Dunn, Debra (DOL)

Uhm it incident is defined in the back.

01:03:41.510 --> 01:03:42.960

Dunn, Debra (DOL)

Thank you.

01:03:44.400 --> 01:03:45.880

Dunn, Debra (DOL)

How it is it is?

01:03:45.760 --> 01:03:46.180

Dela Cruz, Micah

Yes.

01:03:47.250 --> 01:03:48.900

Dela Cruz, Micah

Yeah, and so.

01:03:48.800 --> 01:03:55.920

Dunn, Debra (DOL)

Uh we are still developing our processes around that doing some research about how other agencies.

01:03:56.580 --> 01:04:18.220

Dunn, Debra (DOL)

Uh assess those penalties working with our AG 's office so we don't have really anything built yet about how that would be assessed. But I I believe? What are our intent would likely be first? Is you know education first you know this is for someone who is?

01:04:18.930 --> 01:04:19.640

Dunn, Debra (DOL)

Uh.

01:04:20.880 --> 01:04:23.910

Dunn, Debra (DOL)

Blatantly intentionally.

01:04:25.250 --> 01:04:49.790

Dunn, Debra (DOL)

You know the negligently using the data we find that misuse often is just a mistake. Or they didn't understand it was kind of an innocent thing? Whatever so we have found that education solves the problem and I think that's where we will go first. But for the civil penalties. It would really have to you know rise to a level.

01:04:51.700 --> 01:04:52.580

Dunn, Debra (DOL)

Higher than

01:04:53.750 --> 01:04:54.290

Dunn, Debra (DOL)

you know.

01:04:55.220 --> 01:05:00.150

Dunn, Debra (DOL)

Ah just a mistake or something like that, or a misunderstanding or.

01:05:01.380 --> 01:05:11.610

Dunn, Debra (DOL)

Or something like that, but when we have that I believe we will be beginning stakeholder input once we have that process outlined and identified.

01:05:17.720 --> 01:05:18.810

Carol Landwehr (Guest)

Let's see.

01:05:20.890 --> 01:05:24.250

Dunn, Debra (DOL)

Can I pay the invoice using a credit card?

01:05:26.310 --> 01:05:28.070

Dunn, Debra (DOL)

It depends.

01:05:28.710 --> 01:05:29.570

Dunn, Debra (DOL)

Uh.

01:05:32.670 --> 01:05:34.670

Carol Landwehr (Guest)

And I'm trying to think here most.

01:05:34.600 --> 01:05:36.260

Dunn, Debra (DOL)

Mars E services.

01:05:37.220 --> 01:05:39.610

Dunn, Debra (DOL)

Do not allow a credit card payment.

01:05:40.750 --> 01:05:51.000

Dunn, Debra (DOL)

So we have one of the things that we would love to have in for example, driver record request is that when you do that record instead of doing the a Ch.

01:05:51.580 --> 01:05:59.000

Dunn, Debra (DOL)

That you'd be able to put in credit card information and pay that way. That is one of those system updates that we've been waiting for since the beginning.

01:06:00.500 --> 01:06:08.420

Dunn, Debra (DOL)

Since DRR was created so we're hoping to have that in in the future at some point.

01:06:09.040 --> 01:06:10.370

Dunn, Debra (DOL)

Up the

01:06:12.160 --> 01:06:15.480

Dunn, Debra (DOL)

I'll have to research the rest of this with our.

01:06:16.250 --> 01:06:27.890

Dunn, Debra (DOL)

Uhm accounting Department, but if I recall. I had a conversation it's been years. Now, with our accounting Department that they did not have the capability to accept credit cards.

01:06:27.950 --> 01:06:30.220

Dunn, Debra (DOL)

It's yeah, it headquarters.

01:06:31.060 --> 01:06:32.070

Dunn, Debra (DOL)

The only

01:06:34.200 --> 01:06:47.060

Dunn, Debra (DOL)

well let's get updated information on that 'cause I know you can go into a licensing office and use a credit card. If you're renewing your driver 's license or something like that. Let us get us UN updated information on that one.

01:06:52.560 --> 01:06:54.300

Carol Landwehr (Guest)

OK, thank you Paula for that clarification.

01:06:54.220 --> 01:06:56.110

Dunn, Debra (DOL)

Nation that it is.

01:06:58.050 --> 01:06:58.350

Dunn, Debra (DOL)

Is?

01:06:58.240 --> 01:06:59.050

Carol Landwehr (Guest)

Cereals.

01:07:01.040 --> 01:07:03.490

Carol Landwehr (Guest)

Not my policy, yeah, yeah.

01:07:03.410 --> 01:07:05.820

Dunn, Debra (DOL)

So if if you're following a law.

01:07:06.700 --> 01:07:08.170

Dunn, Debra (DOL)

You have to follow the law.

01:07:11.920 --> 01:07:14.350

Dunn, Debra (DOL)

Driving records not DLTR CDL.

01:07:17.010 --> 01:07:19.660

Dunn, Debra (DOL)

OK, another question.

01:07:20.600 --> 01:07:34.780

Dunn, Debra (DOL)

Will it be mandatory for customers to have cyber liability insurance? Which would include E services customers. Some eservice customers may be required to have it. We're still working out that scale.

01:07:35.750 --> 01:08:01.600

Dunn, Debra (DOL)

But I believe most eservices folks will not because you don't raise to that level of having uh getting enough records. There are a few who are heavy users of these services and they might fall under that,

but again, it would be a scaled approach. So you may not have to have the \$10,000,000.00 worth of Insurance. Maybe you have you know the the bare minimum amount of insurance required?

01:08:07.420 --> 01:08:08.990

Carol Landwehr (Guest)

Sorry my thing jumped.

01:08:09.450 --> 01:08:11.740

Dunn, Debra (DOL)

For cyber liability insurance.

01:08:13.140 --> 01:08:20.450

Dunn, Debra (DOL)

Do you have a single agency in mind or would we have to have an agent that handles that type of insurance?

01:08:21.510 --> 01:08:25.410

Dunn, Debra (DOL)

You know, we cannot recommend any kind of insurance company.

01:08:25.970 --> 01:08:35.290

Dunn, Debra (DOL)

Uh we would just tell you what the requirement is you can use your insurance broker. There are some requirements that it be.

01:08:35.340 --> 01:08:53.840

Dunn, Debra (DOL)

The insurance agent licensed to do business in Washington and have a certain rating that those requirements are already in the insurance requirement clause and we don't anticipate that change, they have to like a a one rate minus rating or something like that.

01:08:55.210 --> 01:09:01.600

Dunn, Debra (DOL)

Those requirements aren't changing but yeah, you would just use whoever you choose.

01:09:05.910 --> 01:09:07.550

Carol Landwehr (Guest)

OK and that's calcium.

01:09:07.810 --> 01:09:09.470

Dunn, Debra (DOL)

Not Mikes, not working so.

01:09:10.480 --> 01:09:18.330

Dunn, Debra (DOL)

Uhm I did I skip any questions accidentally 'cause my little thing was scrolling up and down.

01:09:21.750 --> 01:09:24.170

Dunn, Debra (DOL)

I think that's everything that I see so.

01:09:24.070 --> 01:09:24.710

Shields, Eric (DOL)

Wait.

01:09:25.350 --> 01:09:26.220

Shields, Eric (DOL)

I will pop.

01:09:26.100 --> 01:09:28.270

Dunn, Debra (DOL)

I was just to see if anybody else.

01:09:30.410 --> 01:09:33.540

Dunn, Debra (DOL)

Wants to answer ask any other questions.

01:09:34.400 --> 01:09:59.760

Dunn, Debra (DOL)

Before we go on to our closing remarks. I will reiterate again. This meeting is being recorded for those who I've noticed throughout the meeting. People were jumping on could be that you lost connection and you came back on, but we're asking for folks if you haven't already typed your type here first and last name into the chat were required to document that for recorded meetings.

01:10:01.000 --> 01:10:20.260

Dunn, Debra (DOL)

Uhm and also I'll just reiterate that out of all these questions and comments. We will be developing a frequently asked questions and distributing that out, as it gets updated we do have a webinar tomorrow.

01:10:23.120 --> 01:10:25.930

Dunn, Debra (DOL)

And will likely.

01:10:27.180 --> 01:10:29.120

Dunn, Debra (DOL)

May see some of you back, I don't know.

01:10:30.150 --> 01:10:37.920

Dunn, Debra (DOL)

We will if you can't come back tomorrow. That's fine. We'll capture the questions you know, and put him in our FAQ hello.

01:10:38.760 --> 01:10:40.580

Dunn, Debra (DOL)

Excuse me can you hear me? Yes.

01:10:41.530 --> 01:10:43.490

Dunn, Debra (DOL)

Unfortunately for some reason.

01:10:43.380 --> 01:10:49.520

Agnes Namutebi

I cannot use the chat box so I cannot put in my name OK. I could see your name on the screen.

01:10:49.440 --> 01:10:50.560

Dunn, Debra (DOL)

So we're I think we're good.

01:10:51.250 --> 01:10:52.830

Dunn, Debra (DOL)

Perfect yeah.

01:10:54.290 --> 01:10:56.700

Dunn, Debra (DOL)

Diligence on that thank you.

01:10:58.800 --> 01:10:59.300

Dunn, Debra (DOL)

Check.

01:10:59.350 --> 01:11:00.510

Dunn, Debra (DOL)

Will we eat?

01:11:01.350 --> 01:11:12.940

Dunn, Debra (DOL)

When will we hear from you on the new car new contract OK so in that minute or so. James is going to go over next steps in that kind of that process.

01:11:14.410 --> 01:11:19.960

Dunn, Debra (DOL)

Is the weather like tomorrow going to cover the same stuff the opening will be the same?

01:11:20.410 --> 01:11:20.960

Dunn, Debra (DOL)

Uh.

01:11:22.110 --> 01:11:33.020

Dunn, Debra (DOL)

Other questions may vary because the people may vary, but again we will capture those in our FAQ some of the questions will be.

01:11:33.080 --> 01:11:45.340

Dunn, Debra (DOL)

Some similar we so we may not use him for vad verbatim in the FAQ but will try to capture everything in both the question and the response, especially the response.

01:11:49.160 --> 01:11:50.950

Carol Landwehr (Guest)

Uh using your service.

01:11:50.830 --> 01:11:55.670

Dunn, Debra (DOL)

Chris is do you have to have cyber security?

01:11:58.050 --> 01:12:00.190

Carol Landwehr (Guest)

Well, it depends on that.

01:12:00.060 --> 01:12:07.430

Dunn, Debra (DOL)

It's uh if you are just using our system. You are logging into our system and I believe the security.

01:12:07.940 --> 01:12:09.490

Dunn, Debra (DOL)

Uh covers that.

01:12:10.220 --> 01:12:27.390

Dunn, Debra (DOL)

Uh if you print out a hard copy. There are security requirements for that hard copy earlier. It was mentioned that they keep it in the locked cabinet that kind of thing. The privacy requirements. Do outline those types of requirements that you have to have.

01:12:28.200 --> 01:12:42.840

Dunn, Debra (DOL)

If you turn around and you put that data in another system you get it off the services. You turn around. You entered into another system that system will have to have this meet the security requirements. Yes.

01:12:46.070 --> 01:12:47.580

Carol Landwehr (Guest)

If you look at it in.

01:12:47.460 --> 01:12:49.510

Dunn, Debra (DOL)

Our system and you don't.

01:12:50.470 --> 01:12:54.480

Dunn, Debra (DOL)

Print. It you don't copy anything down you just look at it and leave it right there.

01:12:55.730 --> 01:12:57.080

Dunn, Debra (DOL)

Our system will cover you.

01:13:02.530 --> 01:13:03.780

Carol Landwehr (Guest)

My thing has been.

01:13:03.650 --> 01:13:06.170

Dunn, Debra (DOL)

Moving so I'm hoping to capture everybody.

01:13:07.060 --> 01:13:11.240

Dunn, Debra (DOL)

The annual audit for Diaz is usually in July correct.

01:13:12.410 --> 01:13:12.890

Dunn, Debra (DOL)

Yes.

01:13:13.900 --> 01:13:16.830

Dunn, Debra (DOL)

OK, thank you, it's a summertime when Christy.

01:13:17.140 --> 01:13:19.770

Shields, Eric (DOL)

We will be reaching out as they've done yeah.

01:13:20.380 --> 01:13:22.290

Shields, Eric (DOL)

Think it is the web and R 2.

01:13:22.160 --> 01:13:31.540

Dunn, Debra (DOL)

Tomorrow at 9:30 or 8:00 o'clock as you mentioned earlier and James answered that below. Oh, thank you. James it's 930 I misspoke.

01:13:40.850 --> 01:13:42.010

Carol Landwehr (Guest)

Ah.

01:13:44.980 --> 01:13:54.820

Dunn, Debra (DOL)

Does Dill I'll provide a privacy and security context so that we can put our IT people in touch with DL for questions and ensuring our approach.

01:13:55.480 --> 01:13:57.770

Dunn, Debra (DOL)

Our approach will achieve compliance.

01:14:00.420 --> 01:14:01.850

Dunn, Debra (DOL)

Short answer that is.

01:14:01.740 --> 01:14:02.730

Shields, Eric (DOL)

There's a

01:14:03.500 --> 01:14:04.060

Shields, Eric (DOL)

no.

01:14:05.990 --> 01:14:10.620

Shields, Eric (DOL)

We take the approach that we tell you the what you determined the how.

01:14:11.260 --> 01:14:11.960

Shields, Eric (DOL)

Yeah, and.

01:14:12.550 --> 01:14:22.560

Shields, Eric (DOL)

We are happy to have a conversation with you to determine in advance of what you're proposing would normally satisfy the requirement.

01:14:23.330 --> 01:14:27.630

Shields, Eric (DOL)

I'm so happy to have that conversation, but as far as.

01:14:28.180 --> 01:14:36.950

Shields, Eric (DOL)

A more of a consulting service. We're not going to provide that we have reservations about ever endorsing someone plan.

01:14:38.110 --> 01:14:41.940

Shields, Eric (DOL)

But isn't event, you do follow that plan and something happens, then.

01:14:42.510 --> 01:14:48.920

Shields, Eric (DOL)

It could point back to us that the the deficiency is our fault because we endorsed the plan.

01:14:49.630 --> 01:14:54.070

Shields, Eric (DOL)

So, unfortunately, we don't have a point of contact on that. Yeah.

01:14:55.510 --> 01:14:55.990

Shields, Eric (DOL)

Sorry.

01:14:56.660 --> 01:14:58.700

Shields, Eric (DOL)

But if you need clarification on what the?

01:14:58.570 --> 01:15:01.630

Dunn, Debra (DOL)

Requirement is happy to do that as well. Yeah.

01:15:02.380 --> 01:15:13.830

Dunn, Debra (DOL)

And it would be if you have questions about that now and we'd like to hear about it now, so that we can make those clarifications in the contract template up front, so that everybody has the benefit of that same information.

01:15:21.690 --> 01:15:22.110

Carol Landwehr (Guest)

Yes.

01:15:22.760 --> 01:15:23.940

Carol Landwehr (Guest)

So the next question is.

01:15:24.000 --> 01:15:33.100

Dunn, Debra (DOL)

And you were James Please speak to timeline for going live executing new templates. Yeah, that's part of James talking points coming up.

01:15:36.060 --> 01:15:37.260

Carol Landwehr (Guest)

You know what I'm just gonna.

01:15:37.120 --> 01:15:38.620

Dunn, Debra (DOL)

Go ahead and

01:15:40.820 --> 01:15:43.270

Dunn, Debra (DOL)

but I'll still watch for questions.

01:15:43.950 --> 01:15:52.560

Dunn, Debra (DOL)

But this is the next screen. So you can see that we will be talking about next steps. The new application process effective date set kind of thing.

01:16:00.610 --> 01:16:02.250

Messer, James (DOL)

Did you want me to just go ahead and start with the?

01:16:02.300 --> 01:16:05.770

Messer, James (DOL)

So it looks like we just got a couple more questions left.

01:16:05.620 --> 01:16:06.950

Dunn, Debra (DOL)

Let's try to answer those.

01:16:07.850 --> 01:16:12.470

Dunn, Debra (DOL)

As a request for an employer will we be given a contract.

01:16:16.720 --> 01:16:18.870

Carol Landwehr (Guest)

Uh so the people.

01:16:18.770 --> 01:16:31.880

Dunn, Debra (DOL)

That we provide a contractor who crosschecked directly with us. If we go back to the you know recipient versus requester versus subrecipient. Anybody who gets data directly from us.

01:16:32.490 --> 01:16:34.780

Dunn, Debra (DOL)

We'll get have a contract with us.

01:16:35.430 --> 01:16:41.670

Dunn, Debra (DOL)

Uhm in many cases and the E services. It'll be a Click to agree which you've already clicked to agree on.

01:16:42.120 --> 01:16:49.070

Dunn, Debra (DOL)

Uhm contract in place search is still a paper contract paper digital contract now.

01:16:50.640 --> 01:17:04.830

Dunn, Debra (DOL)

Since we don't have wet signatures anymore. Thank you covid but we are hoping to move to a Click to agree for the contractor plate search as well as well as the abandoned vehicle reporting.

01:17:06.080 --> 01:17:08.520

Dunn, Debra (DOL)

Anybody else who gets the data.

01:17:09.250 --> 01:17:09.980

Dunn, Debra (DOL)

From.

01:17:11.030 --> 01:17:14.120

Dunn, Debra (DOL)

Another person, a recipient an agent.

01:17:15.300 --> 01:17:30.300

Dunn, Debra (DOL)

That kind of thing I uh another sub recipient, you should be getting a contract from the from the entity

that you're getting the data from that is a requirement that we have that as the data gets cast deck Cascades down.

01:17:32.240 --> 01:17:42.490

Dunn, Debra (DOL)

Whoever we get the contract, we give the data to they have a contract with us. If they gave the data to somebody. They have a contract with that person if they gave the data to somebody else.

01:17:43.620 --> 01:17:49.730

Dunn, Debra (DOL)

Then there's a contract there. There are some exceptions to that, so for example.

01:17:50.180 --> 01:17:57.960

Dunn, Debra (DOL)

Uhm before CDL drivers and acronym case you're not familiar with it commercial drivers license CDL.

01:17:58.020 --> 01:17:59.220

Dunn, Debra (DOL)

Uh hum.

01:18:00.090 --> 01:18:03.870

Dunn, Debra (DOL)

Uh you know if someone is employer is sharing.

01:18:05.420 --> 01:18:19.690

Dunn, Debra (DOL)

The driving record with the regulatory bodies, such as FM CSA or US Department of Transportation State Patrol. Whoever that's allowed that's not data sharing that's just following your you know your compliance pieces.

01:18:24.280 --> 01:18:25.170

Carol Landwehr (Guest)

Uh.

01:18:27.010 --> 01:18:29.290

Carol Landwehr (Guest)

Oh looks like my.

01:18:29.180 --> 01:18:32.230

Dunn, Debra (DOL)

My screen somehow in a gateway yes, I'm sorry, let me.

01:18:35.580 --> 01:18:37.190

Carol Landwehr (Guest)

Let me share the screen again.

01:18:37.300 --> 01:18:38.180

Dunn, Debra (DOL)

Sorry about that.

01:18:48.390 --> 01:18:48.960

Carol Landwehr (Guest)

Well.

01:18:51.390 --> 01:18:53.080

Carol Landwehr (Guest)

And James can you see that?

01:18:54.790 --> 01:18:55.720

Dunn, Debra (DOL)

Uh yeah, I can.

01:18:56.040 --> 01:18:57.810

Messer, James (DOL)

Our plan OK somehow I lost it.

01:18:57.680 --> 01:18:58.210

Dunn, Debra (DOL)

Again.

01:18:59.680 --> 01:19:11.590

Dunn, Debra (DOL)

Uh still still yet another question for those who could not attend the webinar. When would the video be available to see a man I would imagine next week.

01:19:13.030 --> 01:19:13.780

Dunn, Debra (DOL)

Uhm.

01:19:18.280 --> 01:19:20.710

Carol Landwehr (Guest)

I uh we would ask that.

01:19:20.570 --> 01:19:29.050

Dunn, Debra (DOL)

You request that we don't have a place to post it right now, so if you want to get a copy of the video or both videos.

01:19:29.730 --> 01:19:30.480

Dunn, Debra (DOL)

Uhm.

01:19:32.020 --> 01:19:40.590

Dunn, Debra (DOL)

From both webinars, please email our group box data contracts at DL dot log.gov and we'll get that for you as soon as I'm available.

01:19:48.360 --> 01:19:50.150

Carol Landwehr (Guest)

OK, James.

01:19:50.680 --> 01:19:51.910

Dunn, Debra (DOL)

Go ahead and take it away.

01:19:52.780 --> 01:19:55.360

Dunn, Debra (DOL)

Sure, thanks Debbie so just want to start.

01:19:55.200 --> 01:20:01.080

Messer, James (DOL)

Blocked by uh you're telling everybody that we do appreciate all the comments and questions today.

01:20:01.590 --> 01:20:06.440

Messer, James (DOL)

Uh we want to conclude this meeting by talking about next steps in the process.

01:20:07.060 --> 01:20:12.410

Messer, James (DOL)

And so we are requesting all feedback you received by close of business on March 4th.

01:20:13.050 --> 01:20:26.270

Messer, James (DOL)

R 4, Bolt contract customers. Please send your feedback to data contracts at DL dot wah.gov and 4. East service customers send repeat back to data services at DL dot.gov.

01:20:27.090 --> 01:20:37.900

Messer, James (DOL)

The deal will be uh will review all feedback and make any applicable changes to the documents once all feedback has been received we will go ahead and develop and distribute an FAQ.

01:20:38.570 --> 01:20:40.960

Messer, James (DOL)

For the Washington administrative code.

01:20:41.850 --> 01:20:46.520

Messer, James (DOL)

There is a 3 phase process for rulemaking we are currently finishing up.

01:20:47.080 --> 01:21:02.240

Messer, James (DOL)

CR 101 or phase one of the rulemaking process, which is to invite the public to participate in discussion of possible rulemaking before any formal notice or action is taken will be moving into CR 102, which is the proposal of rulemaking.

01:21:02.830 --> 01:21:13.120

Messer, James (DOL)

In CR, one or 2 now we will be holding a public hearing and will notify you a minimum of 20 days in advance of the public hearing and do encourage you to to participate in that.

01:21:13.790 --> 01:21:33.940

Messer, James (DOL)

Once we have completed this phase. We will move into CR 103, which is rulemaking adoption after the rule is approved, the rules filed with the office of the code reviser to be put into affect our goal is to have the new Washington administrative code adopted for a November first effective date.

01:21:36.690 --> 01:21:38.900

Carol Landwehr (Guest)

As for contracts will be record.

01:21:38.780 --> 01:21:48.970

Messer, James (DOL)

Acquiring new applications, which must be updated and complete we will notify you when we're ready to begin accepting applications, which we anticipate will be sometime in spring.

01:21:50.140 --> 01:21:54.000

Messer, James (DOL)

The application will be processed on a first come first serve basis.

01:21:54.610 --> 01:22:06.140

Messer, James (DOL)

If an application is incomplete. It'll be sent back for Corrections. We will we will begin issuing new contracts this summer with an effective date of November, first 2022.

01:22:07.040 --> 01:22:21.710

Messer, James (DOL)

After hearing the overview of the draft contracts and Wack and listening to other feedback. You may have additional questions or concerns. Which we do invite you to attend our second webinar scheduled for tomorrow 9:30 to 11:00 AM Pacific Time.

01:22:21.760 --> 01:22:29.270

Messer, James (DOL)

Right uh but we do want to thank you. All for taking the time to be here today and we appreciate any feedback that you provided.

01:22:32.940 --> 01:22:34.680

Carol Landwehr (Guest)

James I see a question.

01:22:35.420 --> 01:22:36.210

Dunn, Debra (DOL)

Ah.

01:22:37.060 --> 01:22:43.270

Dunn, Debra (DOL)

From Sean what is Phase 2 is at Sean could you clarify that that was?

01:22:43.950 --> 01:22:46.560

Dunn, Debra (DOL)

James already covered data, which which Phase 2 or you.

01:22:48.950 --> 01:22:51.170

Carol Landwehr (Guest)

That's that's I think they're talking about the CR one of.

01:22:51.060 --> 01:22:54.640

Messer, James (DOL)

2 Phase 2, the public hearing.

01:22:58.460 --> 01:22:58.940

Carol Landwehr (Guest)

Great.

01:23:00.010 --> 01:23:02.050

Carol Landwehr (Guest)

Yeah, so that's a public hearing will give you.

01:23:02.530 --> 01:23:08.120

Dunn, Debra (DOL)

Will give everybody notice for that? Yeah, OK good that was the WAC process. Thank you.

01:23:12.420 --> 01:23:14.960

Dunn, Debra (DOL)

OK, thank you everyone.

01:23:15.020 --> 01:23:19.860

Dunn, Debra (DOL)

And once again. Thank you so much for participating in this.

01:23:20.450 --> 01:23:26.750

Dunn, Debra (DOL)

Uh process, UM, I'm really happy to see that you guys are engaged and.

01:23:27.420 --> 01:23:28.110

Dunn, Debra (DOL)

Uhm.

01:23:29.100 --> 01:23:40.170

Dunn, Debra (DOL)

And have questions about this that will this will really help us make both the lack and the contract template a better better things for us all to have to live by so.

01:23:40.950 --> 01:23:47.410

Dunn, Debra (DOL)

Uh if I see you tomorrow. I'll see you tomorrow. Otherwise, we'll keep you posted on how we go through this process.

01:23:48.390 --> 01:23:49.590

Dunn, Debra (DOL)

Thank you very much.

01:23:50.040 --> 01:23:52.090

Dunn, Debra (DOL)

Hey question came in.

01:23:52.160 --> 01:23:54.770

Dunn, Debra (DOL)

Yes, yes, yes, there is a question about.

01:23:54.670 --> 01:23:59.570

Shields, Eric (DOL)

Cannot make tomorrow's session and with that recording be available.

01:24:00.120 --> 01:24:09.430

Shields, Eric (DOL)

Yes, my suggestion is the answer is yes, just please. When you request. A copy of today's make sure you note that you wanna copy of the second one as well.

01:24:10.490 --> 01:24:12.290

Shields, Eric (DOL)

Yes, which which date.

01:24:12.160 --> 01:24:12.510

Dunn, Debra (DOL)

Thanks.

01:24:13.170 --> 01:24:14.780

Dunn, Debra (DOL)

No for one or the other.

01:24:16.620 --> 01:24:20.250

Dunn, Debra (DOL)

OK, thank you. Thank you bye bye.